June 14, 2004

The Honorable Wayne T. Gilchrest
Chairman, Subcommittee on Fisheries Conservation, Wildlife & Oceans
188 Ford House Office Building
Washington, DC 20515

RE: Written Testimony of James A. Donofrio for June 16, 2004 Subcommittee Hearing on the Data Collection Programs of NOAA

Dear Mr. Chairman:

On behalf of the Recreational Fishing Alliance (RFA), I appreciate this opportunity to address the Subcommittee regarding the current state of data collection in the recreational saltwater fisheries. The Subcommittee is to be commended for taking up this issue. Time and time again, the recreational fishing sector is plagued by inaccurate and unreliable data that results in more restrictions on recreational fishermen despite healthy stocks of fish. In 2004, we have two perfect examples of how current data collection programs are hurting this country socially and economically: Summer Flounder regulations in New York and the Atlantic Bluefin Tuna recreational regulations. We respectfully urge the Subcommittee to seek improvements in the current recreational data collection system and offer the following suggestions:

1) **Increase funding for recreational data collection programs**

2) **Recognize the diversity within recreational fisheries**

3) **Incorporate additional sources of data to estimate recreational catch**
    a. **Utilize data that is available from the recreational for-hire sector**
    b. **Compare weather data to MRFSS data**
    c. **Develop a voluntary program to acquire data from a fixed cross-section of recreational fishermen**

4) **Estimate numbers of recreational fish caught- not pounds caught**

I. Introduction

The data collection programs currently employed by NOAA produce estimates, which by the very definition, are general calculations with inherent uncertainty. While we understand that achieving a 100 percent confidence interval is an impossibility, it is an absolute necessity to provide the highest quality and most representative estimates to managers. The recreational saltwater industry produces $30.5 billion in sales, nearly $12 billion in personal income, $4.9 billion in federal and state tax revenue, and supports 350,000 jobs.[1] Needless to say, marine recreational fishing is a substantial industry that must be managed in the most informed and responsible manner, and for this reason, the highest quality estimates are paramount.

The majority of the information used to create cumulative estimates of the recreational fishing sectors performance is gathered by the Marine Recreational Statistics Survey (MRFSS), operated by NOAA since 1980. The methodology involves the use of a telephone survey of anglers in coastal counties to collect effort data (number of trips) and an intercept survey to fishing access sites to gather information on landings and discards. This program produces general trends on a multiple-year regional basis of reasonable quality for that scale, but problems with the system become apparent when these estimates are used for management purposes on state and yearly specific scales.

The MRFSS was not designed or intended to be used to such a fine spatial scale, nor be used under quota management. The natural variability of the recreational fishery cause some of the inconsistencies of MRFSS to be problematic. Highly Migratory Species and harvests from party/charter boats are obtained from separate programs. We submit the following suggestions for improving the current data collection system.

II. Increase funding for recreational data collection programs

The current fiscal status of many federal and state agencies charged with recreational fishing data collection can be described as minimal at best. In many instances, agencies are appropriated minimal funding to meet data collection requirements as mandated by regulations. This is sufficient funding to collect the data but not enough to analyze and present the data. In general, data collection programs and agencies are in need of increased funding and the RFA urges this Subcommittee to push for additional funding.

The most obvious remedy is to designate funding specifically for the purpose of increasing sample size in MRFSS. The proportional standard error (PSE) expresses the level of inconsistencies associated with an estimate produced with the MRFSS program. Large PSEs indicate high variability and therefore low precision. North Carolina increased the number of intercepts and interviews which improved the state's data set. Additionally, New Jersey supplemented their NMFS minimum number of intercepts by 3,975 in 2001 and reduced their PSE by 29%. Increasing the sample size does improve precision but each intercept has a cost between $22.60-$19.80 for on-site interviews and

[1] NOAA, The Economic Importance of Marine Angler Expenditures in the United States. January 2004.

$2.85 for phone interviews. Dedicating funds to increase sample size is a quick and effective means of improving MRFSS accuracy for the short-term.

The MRFSS does have limitations and simply increasing the sample size will not address all problems with catch/harvest/participation estimates. In the Mid-Atlantic region, summer flounder accounts for the majority of the on-site intercepts of the MRFSS program, yet having this high volume of data does not always produce estimates with high reliability. An example occurred with the 2003 summer flounder fishery in New York.

MRFSS data for 2003 says that there was a significant increase in New York summer flounder landings compared to 2002 and 2001. However, by all other accounts this was impossible.

New York experienced particularly wet, windy and cool weather last May, June and July. National Weather Service data, party and charter boat Vessel Trip Report (VTR) data, bait and tackle sales data, marina service data, marine fuel sales data, and state boat registration data all indicate that effort, participation and landings in the recreational summer flounder fishery were down in 2003. Yet, MRFSS says New York had some of the highest recreational summer flounder landings on record!

The result of this inaccurate and unreliable data are strict summer flounder regulations which hurt thousands of jobs from Montauk to New York City and the quality of life for nearly a million saltwater anglers in that state.

III. Recognize the diversity within recreational fisheries

Assessing fishing activity in the recreational sector presents unique challenges for managers attempting to produce the most accurate catch, harvest, and participation estimates. The most obvious concern is the shear magnitude of the fishery which is estimated to include 9.1 million saltwater anglers. [2] It has been documented that fishing success in the recreational universe is not consistent. Typically, only a few fishermen catch (harvest) a significant portion of the total recreational harvest, while the majority of fishermen actually catch (harvest) a small amount. Noting this characteristic, participation is not linear with catch.

Another aspect of the recreational fishery that makes accurate estimates difficult is a social consideration: not everyone fishes for the same reason. Attempting to incorporate the 'why people fish' aspect can provide greater insight and possibly accuracy on catch rates. Some anglers fish primarily to bring home fresh seafood while others head out for the experience of pursuing a trophy and yet others head out for relaxation or a combination of all three.

[2] US Fish and Wildlife Service. 2001 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. October 2002

What should be apparent, is that the catch and harvest rates between these groups will be significantly different. Quantifying the different catch rates, size frequencies, and their impacts on the overall resource should be a priority. Moreover, these groups also change between species. The most important point and greatest value of making these classifications is that they have different catch rates, different size frequencies, and ultimately have different impacts on the data collection programs and ultimately the resource. This presents a problem for the standardized survey that is currently in place which assumes a constant catch rate across the recreational fishery, despite its dynamic nature.

IV. Incorporate additional sources of data to estimate recreational catch

MRFSS is currently relied on much too heavily. It is imperative that the National Marine Fisheries Service take immediate steps to begin incorporating additional sources of data to estimate recreational catch.

a. Utilize data that is available from the recreational for-hire sector

The recreational for-hire sector is a tremendous source of recreational catch data that is grossly underutilized. U.S. Coast Guard Licensed captains keep logbooks, Vessel Trip Reports (VTR), and a variety of catch data that can be an invaluable resource- if it's used by NMFS!

Logbooks have been collected from charter/party boats for years. However, the information from these logbooks, though of extreme value, has not been fully analyzed due to lack of funding. We urge this Subcommittee to allocate sufficient funding to support the ongoing collection and analysis of the party/charter boat logbook program and to explore other possibilities to better utilize data that is available from the for-hire sector.

These vessels are often a good indication of catch and effort as well. If they are not sailing due to poor weather or lack of fish, chances are, neither are many individual recreational anglers.

b. Compare weather data to MRFSS data

Recreational fishing is greatly impacted by weather. Participation and subsequent landings during poor weather occurrences are significantly lower than periods of optimal fishing weather. Yet, MRFSS estimates cannot always capture these fluctuations. This can be illustrated in the above mentioned New York summer flounder example, and also when MRFSS reported increased tuna landings despite having hurricanes conditions for several weeks which prevented any recreational vessels from sailing. We suggest that this Subcommittee designate funding for a project to develop a weather corrective factor that can be applied to MRFSS estimates. Threshold wind and wave conditions that limit portions of the fishing effort can be defined and applied to harvest estimates.

c. Develop a voluntary program to acquire data from a fixed cross-section of recreational fishermen

The RFA is willing to work with National Marine Fisheries Service to develop a pilot sampling program that would create fixed sampling sites that would serve as an index for recreational fishing participation. A list of fixed sites could be identified and sampled routinely on permanently assigned days. Sampling these sites could include the number of vessels exiting an inlet, the number of participants paying for passage on charter/party boats, or the number of shore-based anglers fishing from a specific pier or jetty. This information cannot be used exclusively on its own to produce absolute participation and effort results but when coupled with other estimates, including MRFSS, relative trends can be produced. Tournaments can also be considered to be a fixed point, yet, there is an undetermined level of bias associated with tournament fishing that has yet to be fully explored. This uncertainty makes tournament sampling less valued in terms of meeting harvest regulations. However, tournaments can serve as trend indicators.

Another opportunity that NMFS should explore is the use of voluntary reporting from recreational fishermen. Many anglers keep personal logs and have expressed interest in incorporating this information into the management process. This can be done inexpensively through a website, call-in 800 phone number or by mail-in forms. This would provide real numbers in a format compatible with protocols currently used and accepted by ACCSP.

The highly migratory fisheries (HMS) are extremely important to the recreational industry and to recreational anglers. Accurate recreational harvest data of the HMS is important for assessment and for management both domestically and internationally. The 'rare event' nature of the fishery makes catch and harvest data for HMS very difficult to capture with the MRFSS program. NMFS initiated the Large Pelagic Survey (LPS), which operates Maine through North Carolina during the peak fishing periods (June though October). Additional programs are in place in the South Atlantic and the Gulf of Mexico, which piece together various surveys to form a complete estimate. This setup has proven to be inadequate for the complexity of the HMS fisheries.

Two situations have occurred recently where yellowfin tuna landings were greatly underestimated while bluefin tuna landings were greatly overestimated. These estimates are the only source of data currently available to provide recreational catch and effort estimates for use in the ICCAT management process, and despite their weaknesses, they are applied as the "best available". This puts the United States at a great disadvantage in the ICCAT management scheme, as well as weakens the models used to assess the population. The RFA proposes that NMFS work to determine and update the full universe of for-hire vessels participating in HMS fisheries. Further, we suggest that NMFS work to obtain actual yellowfin tuna catch and effort records from voluntary and mandatory logbook programs and they should explore methods of capturing the most accurate bluefin tuna data possible. The recreational anglers that target HMS have great potential to improve data collections and should be utilized.

Just recently, the LPS incorporated a new methodology which allows the interviewers to selectively move between sites in a defined area. The drive of this change was to encourage the interviewers to complete as many interviews as possible during the four-hour onsite period. The RFA believes that the change unreasonably gives more value to the quantity of the interviews as opposed to the quality. We believe that this change also may have played a role in the bluefin tuna harvest estimates which were exceedingly high for the fishing year that the change was implemented. Such a change clearly imposes different behavior while interviewers are onsite and we suggest that sufficient time and funding be available to calibrate the new methodology with the old style LPS.

We suggest that a pilot program be established that would designate fixed check in points that would model big game monitoring programs for hunting. Captains or vessel operators typically will fill fuel tanks upon returning from a fishing trip. Based on this widespread behavior, questionnaires can be given to captains or vessel operators querying the success of their fishing trip. The format can be based on the questions used in the LPS. Compensation would be given to both the marina operator that administer the survey, and the captains or vessel operators that complete the questionnaire to encourage participation by both parties.

V. Estimate numbers of recreational fish caught- not pounds caught

Aside from programs to collect recreational fishing data, the RFA believes that continuing with the current management scheme in which the recreational fishing harvest is calculated in pounds instead of numbers of fish is a situation destined for failure. MRFSS interviewers gather mostly catch data in terms of numbers of fish and only weigh a small fraction of the total recreational harvest. Size frequency information is used to convert the estimate of number into pounds for managers to assess the recreational fishing sector's performance. This is a real problem that is becoming unavoidable in fisheries that are recovering.

As the stocks recover through effective management plans, larger fish which weigh more become more available to the recreational fishing sector. As larger fish become accessible the recreational fishery can easily exceed its target quota while complying with set regulations aimed to meet this target. This clearly occurs with summer flounder, where the harvest, in numbers of fish, is constant but the harvest in pounds of fish is increasing due to larger minimum size limits and a recovering stock. Obviously, this is having a negative effect on the recreational fishing industry that is simply complying with the approved regulations. We urge this Subcommittee to take steps to help modify this at the management level to correct this problem.

These comments outline just a few of the data collection programs in place to capture recreational fishing data. We suggest that the ACCSP, on the Atlantic Coast, serve as the main clearing house for these data collection programs. This will demand increased resources and funding, but having consistency through out all data collection programs will allow a more streamlined framework when changes are needed. This

suggestion and those mentioned above will require a firm commitment on behalf of this Subcommittee to push for the financial support to move forward with data collection improvements. The recreational fishing community will support improving data collection only if they are fully engaged in the process. Grassroots support is a necessity.

I reiterate my appreciation to this Subcommittee for the opportunity to provide perspective and insight into this issue. The recreational fishing industry vastly contributes to the economic health and quality of life of this Nation and is an industry that must be managed in the most informed and responsible manner. The Recreational Fishing Alliance offers its full support to this Subcommittee and NMFS to move forward with improving recreational data collection programs.

Respectfully submitted,

James A. Donofrio
Executive Director